

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Universal Service High-Cost Filing)	WC Docket No. 08-71
Deadlines)	
)	
Federal-State Joint Board on Universal)	CC Docket No. 96-45
Service)	
)	
Petition of MTA Communications, LLC d/b/a)	
MTA Wireless/Matanuska-Kenai, Inc. for)	
Waiver of Sections 54.307 and 54.903 of the)	
Commission's Rules)	
_____)	

**PETITION OF MTA COMMUNICATIONS, LLC D/B/A MTA
WIRELESS/MATANUSKA-KENAI, INC.
FOR WAIVER OF SECTIONS 54.307 AND 54.903 OF THE COMMISSION'S RULES**

Pursuant to section 1.3 of the Federal Communications Commission's ("Commission" or "FCC") rules,¹ MTA Communications, LLC d/b/a MTA Wireless/Matanuska-Kenai, Inc. ("MTAC"), respectfully requests a waiver of the March 30, 2015 FCC Form 525 high-cost line count filing deadline set forth in sections 54.307 and 54.903 of the Commission's rules.² MTAC made a clerical error by inadvertently failing to check the Interstate Common Line Support ("ICLS") box on Form 525 when it submitted its line count information on March 24, 2015.³ The ICLS Worksheet was included with the March 24, 2015 filing but the data was removed when

¹ 47 C.F.R. § 1.3.

² 47 C.F.R. §§ 54.307, 54.903.

³ MTA's March 24, 2015 Form 525 is attached hereto as Exhibit A.

the checkbox was not checked.⁴ MTAC discovered its clerical error in August 2015 and promptly contacted the Universal Service Administrative Company (“USAC”).

Consistent with Commission precedent, good cause exists to grant MTAC’s petition. Accordingly, the Commission should waive the March 30, 2015 FCC Form 525 line count filing deadline and direct USAC to accept MTAC’s line count data. Failure to waive the deadline would result in the loss to MTAC of approximately \$425,000 in high-cost federal universal service funding, and would pose an undue hardship to the company and the nearly 8,000 high-cost Alaska customers who rely upon MTAC to meet their telecommunications needs.

I. STATEMENT OF FACTS.

MTAC is an Alaska company that provides an array of telecommunications services to high-cost customers in Alaska including, but not limited to: (1) traditional voice grade access to the public switched network; (2) local usage; (3) access to operator, directory assistance and emergency services; and (4) wireless cellular services, including a locally-based wireless alternative. MTAC has upgraded most of its network to state-of-the-art code division multiple access technology. MTAC has provided high quality telecommunications services to Alaska customers since 1991 and has received high-cost federal universal service funding since 2005. Currently, MTAC’s service area extends across nearly 9,000 square miles and the company serves almost 8,000 high-cost Alaska telecommunications customers in approximately nineteen communities.⁵ MTAC operates a reliable network, transmits a high-quality signal, and provides high-quality service. MTAC implemented multiple back-up and redundancy features that allow it

⁴ The ICLS Worksheet with correct line count information is attached hereto as Exhibit B.

⁵ The communities in which MTAC provides high-cost telecommunications services include, but are not necessarily limited to, Big Lake, Butte, Chickaloon, Deshka, Glenn Highway Flats, Goose Bay/Port McKenzie, Hatcher Pass, Meadow Lakes, Houston, Palmer, Petersville, Sheep Mountain, South Big Lake, Sutton, Skwenta, Talkeetna, Trapper Creek, Wasilla and Willow.

to assure reliable, safe and efficient telecommunications service to its rural Alaska customers. In remote areas, MTAC provides essential safety services for customers in distress, some of whom are engaged in outdoor activities for whom MTAC is the only signal they can receive.

MTAC has timely filed all of its FCC Form 525 high-cost line count filings since 2004, when the company first began receiving high-cost funding, with one exception.⁶ To be clear, MTAC also timely filed its FCC Form 525 before the March 30, 2015 deadline. MTAC seeks a waiver of this deadline due to a clerical error caused by unique events prior to the filing deadline. MTAC is a small company that employs a single regulatory employee. At the time of the March 30, 2015 filing deadline MTAC's current regulatory employee had recently been promoted to that position fewer than six months previously. The employee dutifully verified all of the data submitted with the March 30, 2015 FCC Form 525, but inadvertently failed to verify that all of the checkboxes on the FCC Form 525 cover sheet were properly checked. To the best of MTAC's knowledge the missing checkbox caused the ICLS Worksheet to be filed with USAC without line count data.

MTAC emphasizes that it timely filed its line count submission prior to the March 30, 2015 deadline. Further, upon discovering the error when its monthly disbursement from USAC was \$141,653 short of expected, the company conducted an internal review and promptly contacted USAC to determine the cause.⁷ USAC informed MTAC of the need for a waiver from the Commission, which MTAC now diligently files.

⁶ MTA was granted a waiver of the September 30, 2013 filing deadline for a late filed form. *See Universal Service High-Cost Filing Deadlines, Federal-State Joint Board on Universal Service*, WC Docket No. 08-71, CC Docket No. 96-45, Order, before the FCC (rel. Mar. 27, 2014) ("*MTA Waiver Request Order*").

⁷ MTA's disbursement report was dated August 28, 2015 and MTA contacted USAC on September 14, 2015.

II. GOOD CAUSE EXISTS FOR THE COMMISSION TO WAIVE SECTIONS 54.307 AND 54.903 OF ITS RULES IN THIS INSTANCE.

The Commission may waive its rules for good cause shown.⁸ Specifically, the Commission may exercise its discretion to waive a rule where the particular facts at issue make strict compliance with the rule inconsistent with the public interest.⁹ The Commission may take into account considerations of hardship, equity, or more effective implementation of overall policy on an individual basis.¹⁰ In sum, a waiver of a filing deadline is appropriate when special circumstances warrant a deviation from the general rule and such deviation will serve the public interest.¹¹

The Commission previously found that good cause exists to waive filing deadlines where the petitioning party demonstrates that the missed deadline was the result of a minor ministerial, clerical or procedural error.¹² The Commission has also held that good cause exists when the petitioning party promptly remedies its failure to timely file and revises its internal procedures to ensure compliance.¹³ Consistent with Commission precedent, a waiver is justified in this case. Absent a waiver, MTAC will lose approximately \$425,000 in high-cost federal universal service funding. These funds are critical to MTAC's ability to serve its high-cost Alaska customers and the loss of such funding would be detrimental to the public interest. Failure to receive these funds would limit the telecommunications choices and mobility available to rural Alaska

⁸ 47 C.F.R. § 1.3.

⁹ *WAIT Radio v. FCC*, 418 F.2d 1153, 1157 (D.C. Cir. 1969), *cert. denied*, 409 U.S. 1027 (1972) ("WAIT"); *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) ("Northeast Cellular").

¹⁰ *WAIT*, 418 F.2d at 1159; *Northeast Cellular*, 897 F.2d at 1166.

¹¹ *NetworkIP, LLC v. FCC*, 548 F.3d 116, 127-28 (D.C. Cir. 2008); *Northeast Cellular*, 897 F.2d at 1166.

¹² *See In the Matter of Petitions for Waiver of Universal Service High-Cost Filing Deadlines, et al.*, WC Docket No. 08-71, Order, DA 13-2094, (rel. Oct. 29, 2013) at para. 7.

¹³ *See, e.g., In the Matter of Petitions for Waiver of Universal Service High-Cost Filing Deadlines, et al.*, WC Docket No. 08-71, CC Docket No. 96-45, Order, DA 10-107 (rel. Jan. 22, 2010) at para. 22.

communities and compromise the ability of MTAC's customers to access critical health and safety services when away from their residences.

Good cause exists in this case because MTAC timely filed the Form 525 prior to the March 30, 2015 deadline. This Waiver corrects an error in filling out the form, not a substantive error. Due to a clerical error, MTAC inadvertently failed to check the box for ICLS on the Form 525, which MTAC believes caused the ICLS worksheet to report a zero line count and resulted in MTAC's loss of approximately \$425,000 in high-cost federal support. Upon learning of the mistake, MTAC immediately took steps to rectify the error. MTAC acknowledges that in its prior Waiver request, the Commission noted that it expected MTAC not to file a similar waiver request again.¹⁴ MTAC apologizes that it must seek another waiver, but affirmatively states that the prior waiver and this request are substantially different. In the prior waiver request, MTAC missed the filing deadline and was seeking permission to make a late filing; in the current request, MTAC complied with all of the requirements of the Commission's rules but inadvertently failed to check a single box on the Form. It would be unjust to MTAC and MTAC's customers for a single, clerical mistake to deprive MTAC of approximately \$425,000. Thus, hardship and equity considerations support the grant of MTAC's requested waiver.¹⁵

CONCLUSION

The loss of approximately \$425,000 in high-cost funding would cause MTAC and its customers undue hardship. The loss of this funding would result in the decreased availability of

¹⁴ *MTA Waiver Request Order* at para. 10 (“We rely on both Cordova and MTAW to fulfill their commitments to adhere to their revised filing procedures, and do not anticipate either carrier will seek similar waivers again.”).

¹⁵ *In the Matter of Federal-State Joint Board on Universal Service, et al.*, CC Docket No. 96-45, Order, DA 06-2584 (rel. Dec. 28, 2006) at para. 5 (finding that “[i]n this case, . . . considerations of hardship and equity – as well as North River’s longstanding history or submitting timely data – weigh in favor of granting the requested waiver” and stating that previous waivers had been granted to “ensure that consumers in all regions of the Nation, including low-income consumers and those in rural, insular, and high-cost areas, have access to telecommunications and information services.”).

telecommunications services to high-cost customers in Alaska and compromise access to critical health and safety services. The grant of this waiver request will benefit the public interest and is consistent with existing Bureau precedent regarding the waiver of high-cost deadlines. For the foregoing reasons, MTAC respectfully requests that the Commission promptly grant this petition for waiver of sections 54.307 and 54.903 of the FCC's rules and direct USAC to accept the company's amended March 30, 2015 FCC Form 525 line count filing.

Respectfully submitted this 6th day, October, 2015.

DYKEMA GOSSETT, PLLC
Attorneys for MTA Communications, LLC d/b/a MTA
Wireless/Matanuska-Kenai, Inc.

By: /s/ Shannon M. Heim
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elevy@dykema.com

DECLARATION OF WANDA TANKERSLEY

I, Wanda Tankersley, Chief Financial Officer of Matanuska Telephone Association, Inc./Matanuska-Kenai, Inc., have read the foregoing Petition for Waiver of Sections 54.307 and 54.903 of the Commission's Rules and declare under penalty of perjury that the factual statements made therein are true and correct to the best of my personal knowledge, information, and belief.

Executed on October 6, 2015.

By: Wanda Tankersley

Wanda Tankersley
Chief Financial Officer
Matanuska Telephone Association, Inc.
701 E. Parks Highway
Wasilla, Alaska 99654
Phone: (907) 761-2654

Exhibit A

March 24, 2015 FCC Form 525 Filing

FCC Form 525
High Cost Support Mechanism
Competitive Carrier Line Count Report

FCC Form 525
OMB Control No. 3060-0986
January 2005

COMPETITIVE CARRIERS HIGH COST DATA SUBMISSION

(1) Quarterly Submission Date:	03/24/2015
(2) USAC Service Provider Identification Number (SPIN):	143000432
(3) Company Study Area Code: (First time filers leave blank and a Study Area Code will be assigned)	619003
(4) Study Area Name:	MATANUSKA-KENAI, INC. - CL
(5) Company Legal Name:	MATANUSKA-KENAI, INC. - CL
(6) Filer 499 ID:	809610

Do not write in this Area:
For Administrator's Use Only

Submitted ONLINE
03/24/2015 17:51:27

Check Box if this is a new address/contact from a previous data submission:

(7) Mailing Address:	1740 S Chugach St., Palmer, AK 99645		
(8) Contact Name:	Wanda Tankersley	(9) Title:	CFO
(10) Telephone Number:	9077612654		
(11) E-mail Address:	wtankersley@mta-telco.com		

(12) Mechanism for which you are requesting support:	(13) Lines Reported as of:	(14) Type of Filing		(15) Worksheet to Complete
		Original	Revision	
High Cost Loop Support (HCL)	Sep 30, 2014	✓		Complete HCL and LSS
Local Switching Support (LSS)	Sep 30, 2014	✓		Complete HCL and LSS
Interstate Common Line Support (ICLS)	Sep 30, 2014			Complete ICLS Worksheet
High Cost Model Support (HCM)	Sep 30, 2014			Complete HCM Worksheet
Interstate Access Support (IAS)	Dec 31, 2014			Complete IAS Worksheet

FCC Form 525
High Cost Support Mechanism
Competitive Carrier Line Count Report

FCC Form 525
OMB Control No. 3060-0986
January 2005

HIGH COST LOOP (HCL) AND LOCAL SWITCHING SUPPORT (LSS) LINE COUNT WORKSHEET

(2) USAC Service Provider Identification Number (SPIN):	143000432		Do not write in this Area: For Administrator's Use Only				
(3) Company Study Area Code:	619003						
(4) Study Area Name:	MATANUSKA-KENAI, INC. - CL						
(13) Lines Reported as of:	Sep 30, 2014						
(14) Type of Filing:	Original						
Line Count Data for Path 1, 2 & 3 Carriers <small>Where carrier reports both UNEs and facilities based lines in the same SAC or disaggregation zone, carrier shall list UNEs in a separate row. Complete one row for each disaggregation zone.</small>							
(16) Incumbent Carrier Name	(17) Incumbent Carrier SAC	(18) ETC Designation	(19) Path Designation	(20) Disaggregation Zone Name	(21) Wire Center CLLI Code	(22) Total Number of Lines in Service	(23) Were any lines provided through UNEs? If yes, please fill out the UNE Agreement Information.
MATANUSKA TEL ASSOC	613015	Y	3			0	N
MATANUSKA TEL ASSOC	613015	Y	3	Big Lake Zone 2	BGLKAKXA	414	N
MATANUSKA TEL ASSOC	613015	Y	3	Big Lake Zone 2	BGLKAKXA	0	N
MATANUSKA TEL ASSOC	613015	Y	3	Cantwell Zone 2	CNTWAKXA	7	N
MATANUSKA TEL ASSOC	613015	Y	3	Chugiak Zone 1	CHGKAKXA	0	N
MATANUSKA TEL ASSOC	613015	Y	3	Chugiak Zone 2	CHGKAKXA	0	N
MATANUSKA TEL ASSOC	613015	Y	3	Eagle River Zone 1	EGRVAKXA	0	N
MATANUSKA TEL ASSOC	613015	Y	3	Eagle River Zone 2	EGRVAKXA	0	N
MATANUSKA TEL ASSOC	613015	Y	3	Palmer Zone 1	PLMRAXXA	2763	N
MATANUSKA TEL ASSOC	613015	Y	3	Palmer Zone 2	PLMRAXXA	389	N
MATANUSKA TEL ASSOC	613015	Y	3	Talkeetna Zone 1	TLKTAKXA	234	N
MATANUSKA TEL ASSOC	613015	Y	3	Talkeetna Zone 2	TLKTAKXA	70	N
MATANUSKA TEL ASSOC	613015	Y	3	Wasilla Zone 1	WSLLAKXA	2180	N
MATANUSKA TEL ASSOC	613015	Y	3	Wasilla Zone 2	WSLLAKXA	2029	N
MATANUSKA TEL ASSOC	613015	Y	3	Willow Zone 2	WLLWAKXA	406	N

FCC Form 525
High Cost Support Mechanism
Competitive Carrier Line Count Report

FCC Form 525
OMB Control No. 3060-0986
January 2005

INTERSTATE COMMON LINE SUPPORT (ICLS) LINE COUNT WORKSHEET

(2) USAC Service Provider Identification Number (SPIN):	143000432		Do not write in this Area: For Administrator's Use Only					
(3) Company Study Area Code:	619003							
(4) Study Area Name:	MATANUSKA-KENAI, INC. - CL							
(13) Lines Reported as of:	Sep 30, 2014							
(14) Type of Filing:								
Line Count Data for Path 1, 2 & 3 Carriers <i>Complete one row for each disaggregation zone.</i>								
(24) Incumbent Carrier Name	(25) Incumbent Carrier SAC	(26) ETC Designation	(27) Path Designation	(28) Disaggregation Zone Name	(29) Wire Center CLLI Code	(30) Residence & Single Line Business	(31) Multi-line Business	(32) Total Number of Lines in Service
MATANUSKA TEL ASSOC	613015	Y	3			0	0	0
MATANUSKA TEL ASSOC	613015	Y	3	Big Lake Zone 2	BGLKAKXA	0	0	0
MATANUSKA TEL ASSOC	613015	Y	3	Big Lake Zone 2	BGLKAKXA	0	0	0
MATANUSKA TEL ASSOC	613015	Y	3	Cantwell Zone 2		0	0	0
MATANUSKA TEL ASSOC	613015	Y	3	Chugiak Zone 1		0	0	0
MATANUSKA TEL ASSOC	613015	Y	3	Chugiak Zone 2		0	0	0
MATANUSKA TEL ASSOC	613015	Y	3	Eagle River Zone 1		0	0	0
MATANUSKA TEL ASSOC	613015	Y	3	Eagle River Zone 2		0	0	0
MATANUSKA TEL ASSOC	613015	Y	3	Palmer Zone 1		0	0	0
MATANUSKA TEL ASSOC	613015	Y	3	Palmer Zone 2		0	0	0
MATANUSKA TEL ASSOC	613015	Y	3	Talkeetna Zone 1		0	0	0
MATANUSKA TEL ASSOC	613015	Y	3	Talkeetna Zone 2		0	0	0
MATANUSKA TEL ASSOC	613015	Y	3	Tyonek Zone 2		0	0	0
MATANUSKA TEL ASSOC	613015	Y	3	Wasilla Zone 1		0	0	0
MATANUSKA TEL ASSOC	613015	Y	3	Wasilla Zone 2		0	0	0
MATANUSKA TEL ASSOC	613015	Y	3	Willow Zone 2		0	0	0

FCC Form 525
High Cost Support Mechanism
Competitive Carrier Line Count Report

FCC Form 525
OMB Control No. 3060-0986
January 2005

HIGH COST MODEL (HCM) LINE COUNT WORKSHEET

(2) USAC Service Provider Identification Number (SPIN):	143000432	Do not write in this Area: For Administrator's Use Only			
(3) Company Study Area Code:	619003				
(4) Study Area Name:	MATANUSKA-KENAI, INC. - CL				
(13) Lines Reported as of:	Sep 30, 2014				
(14) Type of Filing:					
Complete one row for each Wire Center.					
(33) Incumbent Carrier Name	(34) Incumbent Carrier SAC	(35) ETC Designation	(36) Wire Center CLLI Code	(37) Wire Center Name	(38) Total Lines

FCC Form 525
High Cost Support Mechanism
Competitive Carrier Line Count Report

FCC Form 525
OMB Control No. 3060-0986
January 2005

INTERSTATE ACCESS SUPPORT (IAS) LINE COUNT WORKSHEET

(2) USAC Service Provider Identification Number (SPIN):	143000432	Do not write in this Area: For Administrator's Use Only
(3) Company Study Area Code:	619003	
(4) Study Area Name:	MATANUSKA-KENAI, INC. - CL	
(13) Lines Reported as of:	Dec 31, 2014	
(14) Type of Filing:		

Complete one row for each Incumbent Carrier Area Served.			Number of Lines								
			Zone 1		Zone 2		Zone 3		Zone 4		
(39) Incumbent Carrier Name	(40) Incumbent Carrier SAC	(41) ETC Designation	(42) Residence & Single Line Business	(43) Multi-Line Business	(44) Residence & Single Line Business	(45) Multi-Line Business	(46) Residence & Single Line Business	(47) Multi-Line Business	(48) Residence & Single Line Business	(49) Multi-Line Business	(50) Total Lines

UNBUNDLED NETWORK ELEMENTS REPORTING

(2) USAC Service Provider Identification Number (SPIN):	143000432	Do not write in this Area: For Administrator's Use Only
(3) Company Study Area Code:	619003	
(4) Study Area Name:	MATANUSKA-KENAI, INC. - CL	

Complete one worksheet for each study area of a Path 1 rural incumbent carrier in which the competitive carrier is reporting lines and uses unbundled network elements ("UNEs") to serve the reported lines. The competitive carrier must separately identify the number of UNE loops; UNE price per loop; any port and vertical services costs included in the UNE loop price; number of loops receiving UNE switching service; the UNE switching price per minute and number of switching minutes.

(51) Incumbent Carrier Name:	
(52) Incumbent Carrier Study Area Code:	

Please provide the following information for Path 1 Rural Incumbent Carrier Study Area:

(53) UNE Zone	Loops w/o Port Cost		Loops w/Ports		Vertical Services		Switching		
	(54) No. of Loops	(55) Price per loop	(56) No. of ports	(57) Price/port	(58) No. of loops w/Vertical Services	(59) Price for vertical services on each loop	(60) No. of loops with switching	(61) No. of switching minutes	(62) Price/minute
Zone 1									
Zone 2									
Zone 3									
Zone 4									
Zone 5									

Complete one worksheet for each study area for a Path 2 or Path 3 rural incumbent carrier in which the competitive carrier is reporting lines and uses unbundled network elements ("UNEs") to serve the reported lines. For each incumbent study area, list the name of each disaggregation zone. If disaggregation zone includes more than one UNE zone, please report the lines in each UNE zone per aggregation zone on a separate row. The competitive carrier must separately identify the number of UNE loops; UNE price per loop; any port and vertical services costs included in the UNE loop price; number of loops receiving UNE switching service; the UNE switching price per minute and number of switching minutes.

Please provide the following information for Path 2 and Path 3 rural incumbent carrier study areas:

(63) UNE Zone Name	(64) Disaggregation Zone Name	(65) UNE type	(66) Quantity	(67) Price	(68) Minutes
		Loops without port costs			
		Ports			
		No. of loops w/Vertical Services			
		No. of loops w/switching			
		Loops without port costs			
		Ports			
		No. of loops w/Vertical Services			
		No. of loops w/switching			
		Loops without port costs			
		Ports			
		No. of loops w/Vertical Services			
		No. of loops w/switching			
		Loops without port costs			
		Ports			
		No. of loops w/Vertical Services			
		No. of loops w/switching			

FCC Form 525
High Cost Mechanism
Competitive Carrier Line Count Report

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TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING FCC FORM 525 ON ITS OWN BEHALF:

Certification of Officer or Employee as to the Accuracy of the Data Reported in FCC Form 525, Line Count Report for Competitive Carriers, on Behalf of Reporting Carrier

I certify that I am an officer or employee of the reporting carrier; my responsibilities include ensuring the accuracy of the actual line count data reported on FCC Form 525; and, to the best of my knowledge, the information reported on this form is accurate.

Name of Reporting Carrier: MATANUSKA-KENAI, INC. - CL

Service Provider Identification Number: 143000432

Signature of authorized officer or employee: CERTIFIED ONLINE

Date: 03/24/2015

Printed name of authorized officer or employee: Wanda Tankersley

Title or position of authorized officer or employee: CFO

Telephone number of authorized officer or employee: (907) 761-2654 ext.

Study Area Code of Reporting CETC

619003

Filing Due Date for this form
(mm/dd/yyyy)

03/30/2015

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communication Acts of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

FCC Form 525
High Cost Support Mechanism
Competitive Carrier Line Count Report

FCC Form 525
OMB Control No. 3060-0986
January 2005

NOTICE: Sections 54.307(b) and 54.802(a) of the Federal Communications Commission's rules requires all competitive eligible telecommunications carriers to provide line count information to USAC, the universal service Administrator, in order to be eligible to receive support. Pursuant to Sections 54.307(c) and 54.802(a), this information must be submitted by support mechanism on a quarterly basis in accordance with the incumbent carrier's line count reporting schedule. This collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended, 47 U.S.C. 254. The data in the form will be used to calculate the amount of support, if any, that each reporting carrier is eligible to receive from the High Cost support mechanisms.

We have estimated that each response to this collection of information will take, on average, 5 hours. Our estimate includes the time to read the instructions, look through existing records, gather and maintain the required data, and actually complete and review the form or response. If you have any comments on this estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PER, Washington, D.C. 20554, Paperwork Reduction Project (3060-0986). We also will accept your comments via the Internet if you send them to Judith-B.Herman@fcc.gov. Please DO NOT SEND COMPLETED DATA COLLECTION FORMS TO THIS ADDRESS.

Remember -- You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid Office of Management and Budget (OMB) control number. This collection has been assigned an OMB control number of 3060-0986.

The Commission is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information that you provide to determine High Cost support amounts for competitive eligible telecommunications carriers. If we believe there may be a violation or potential violation of a statute or a Commission regulation, rule, or order, your form may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation, or order. In certain cases, the information in your form may be disclosed to the Department of Justice, court, or other adjudicative body when (a) the Commission; (b) any employee of the Commission; or (c) the United States government, is a party to a proceeding before the body or has an interest in the proceeding.

If you do not provide the information we request on this form, you are not eligible to receive support under the High Cost support mechanisms, 47.C.F.R. 54.307 and 54.802.

The foregoing Notice is required by the Paperwork Reduction Act of 1995, P.L. No. 104-13, 44 U.S.C. 3501, et seq.

Exhibit B

Corrected March 24, 2015 ICLS Worksheet

FCC Form 525
High Cost Support Mechanism
Competitive Carrier Line Count Report

FCC Form 525
OMB Control No. 3060-0986
January 2005

INTERSTATE COMMON LINE SUPPORT (ICLS) LINE COUNT WORKSHEET

(2) USAC Service Provider Identification Number (SPIN):	143000432		Do not write in this Area: For Administrator's Use Only					
(3) Company Study Area Code:	619003							
(4) Study Area Name:	MATANUSKA-KENAI, INC. - CL							
(13) Lines Reported as of:	Sep 30, 2014							
(14) Type of Filing:								
Line Count Data for Path 1, 2 & 3 Carriers <i>Complete one row for each disaggregation zone.</i>								
(24) Incumbent Carrier Name	(25) Incumbent Carrier SAC	(26) ETC Designation	(27) Path Designation	(28) Disaggregation Zone Name	(29) Wire Center CLLI Code	(30) Residence & Single Line Business	(31) Multi-line Business	(32) Total Number of Lines in Service
MATANUSKA TEL ASSOC	613015	Y	3			0	0	0
MATANUSKA TEL ASSOC	613015	Y	3	Big Lake Zone 2	BGLKAKXA	384	30	414
MATANUSKA TEL ASSOC	613015	Y	3	Big Lake Zone 2	BGLKAKXA	0	0	0
MATANUSKA TEL ASSOC	613015	Y	3	Cantwell Zone 2		7	0	7
MATANUSKA TEL ASSOC	613015	Y	3	Chugiak Zone 1		0	0	0
MATANUSKA TEL ASSOC	613015	Y	3	Chugiak Zone 2		0	0	0
MATANUSKA TEL ASSOC	613015	Y	3	Eagle River Zone 1		0	0	0
MATANUSKA TEL ASSOC	613015	Y	3	Eagle River Zone 2		0	0	0
MATANUSKA TEL ASSOC	613015	Y	3	Palmer Zone 1		2333	430	2763
MATANUSKA TEL ASSOC	613015	Y	3	Palmer Zone 2		381	8	389
MATANUSKA TEL ASSOC	613015	Y	3	Talkeetna Zone 1		194	40	234
MATANUSKA TEL ASSOC	613015	Y	3	Talkeetna Zone 2		70	0	70
MATANUSKA TEL ASSOC	613015	Y	3	Tyonek Zone 2		0	0	0
MATANUSKA TEL ASSOC	613015	Y	3	Wasilla Zone 1		2015	165	2180
MATANUSKA TEL ASSOC	613015	Y	3	Wasilla Zone 2		1945	84	2029
MATANUSKA TEL ASSOC	613015	Y	3	Willow Zone 2		398	8	406